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**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

LISA S. BLACK,)	CIVIL ACTION NO. 05-0038
)	
Plaintiff,)	
)	
vs.)	DEFENDANT CNMI PUBLIC
)	SCHOOL SYSTEM (PSS) VOIR DIRE
JIM BREWER, individually and in his)	
official capacity as Acting Principal for)	
Hopwood Junior High School,)	
COMMONWEALTH OF THE NORTHERN)	
MARIANA ISLANDS PUBLIC SCHOOL)	
SYSTEM, and JOHN AND/OR JANE DOE,)	
)	
Defendants.)	

Comes now the public school system and hereby submits the following general and specific voir dire questions.

GENERAL VOIR DIRE

1. Lawyers and the parties. Do any of you know either any of the lawyers George Hasselback, Michael Dotts, Gregory Baka or Heather Kennedy? Has either / any of them or anyone in their office ever represented you?
2. Do you know the parties? How do you know them?

2. If you know any of them, what is your opinion of the person? How would it affect your ability to be a juror in this case?
3. Do you know any of the potential witnesses?
4. Have you or any family member or close personal friend ever filed a claim or a lawsuit of any kind?
5. Has anyone ever filed a claim or a lawsuit against you or a member of your family or a close friend?
6. If yes to 4 or 5, what the lawsuit about?
7. Have you served on a jury before? Where you a foreperson?
8. Where do you work?
9. What is your occupation?
10. Have you ever worked for a government agency?
11. If retired what is your former occupation?
12. Have you ever been convicted of a crime?
13. If the law and evidence warranted, would you be able to render a verdict in favor of the plaintiff or defendant regardless of any sympathy you may have for either party?
14. A plaintiff has to prove fault of a defendant before he or she is entitled to recover money damages from that defendant. Do you have any difficulty accepting that concept?
15. If the evidence warrants awarding no money damages to the plaintiff, will you be able to return such a verdict?
16. Based on what you have heard, is there anything about this case or the nature of the claim itself that would interfere with your ability to be fair and impartial and to apply the law as instructed by the court?

Specific Questions to the Case:

1. Do you know anything about this case or any problems at HJHS from any source like the television, radio, newspaper or friends?
2. How do you think PSS is doing in educating students?
3. Do you or any family member work for PSS?

- 1 a. What was your experience with working at PSS?
- 2 b. What is your view on how well PSS is doing in the workplace.
- 3 4. Have you or a family member ever been fired from or lost a job?
- 4 a. Can you explain why you lost your job and whether you attribute the loss
- 5 to factors within or out of your control?
- 6 5. Have you or any family member ever been not renewed at a job? If so what happened
- 7 and how did it make you feel?
- 8 6. A defendant is a person or corporation, or government agency against whom a lawsuit
- 9 has been brought. Do you have a bias for or against a defendant simply because a lawsuit
- 10 has been brought against him or her? If the answer to this question is affirmative, ask the
- 11 following question: If so, what are your feelings?
- 12 7. What reasonable steps can an employer take with an employee who consistently fails to
- 13 perform up to standards?
- 14 8. Have you or any family member ever been discriminated by an employer?
- 15 9. Have you ever suffered any emotional injury?
- 16 10. How do you feel the PSS is doing in retaining teachers/ hiring employees/ recruiting
- 17 highly qualified personnel?
- 18 11. Do you think PSS is not doing enough to retain highly qualified teachers?
- 19 12. Do you think teachers are not properly compensated?
- 20 13. Would you be able to go home and look your family in the eye and say that you voted to
- 21 send a teacher/ government employee home with no money at all?
- 22 14. Do you think giving large damage awards is the best way to punish a company you feel
- 23 has done something wrong?
- 24 15. Knowing that the plaintiff in this case is claiming an injury, do you start off with some
- 25 number in your head that is a reasonable amount to award for that kind of damage? Is
- 26 there any number that in your mind is too low?
- 27 16. Who here believes that most people do not take emotional distress and suffering seriously
- 28 enough?
17. Do feel that it might be hard for you to set sympathy aside in making this decision?

1 Respectfully submitted by:

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3 _____/s/_____
4 Heather L. Kennedy F0246
5 Attorney for the Public School System
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